

HEATHER E. WILLIAMS, #122664
Federal Defender
MEGAN T. HOPKINS, #294141
Assistant Federal Defender
Designated Counsel for Service
801 I Street, 3rd Floor
Sacramento, CA 95823
Telephone: 916-498-5700
Fax: 916-498-5710

Attorney for Defendant
JOSE CURIEL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:22-cr-000151-WBS
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE STATUS CONFERENCE AND
v.)	EXCLUDE TIME
)	
JOSE CURIEL, ET AL)	
)	Date: March 6, 2023
Defendants.)	Time: 9:00 a.m.
)	
)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel, Assistant United States Attorney Justin Lee, counsel for plaintiff, Assistant Federal Defender Megan T. Hopkins, counsel for defendant Jose Curiel, and Clemente M. Jimenez, counsel for defendant Roberto Tostado-Cadenas, that the status conference scheduled for December 12, 2022, be continued to **March 6, 2023, at 9:00 a.m.**

The government has provided defense counsel with a substantial batch of initial discovery, which defense counsel is in the process of reviewing and is conducting investigation therefrom. The parties believe a continuance to March 6, 2023, will permit defense counsel the additional time necessary to conduct pretrial investigation, identify and interview witnesses, obtain pertinent records, and engage in pre-plea negotiations.

1 The parties agree that the ends of justice served by resetting the status conference date
2 outweigh the best interest of the public and the defendant in a speedy trial. Therefore the parties
3 agree that time is excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).
4

5 Dated: December 7, 2022

Respectfully submitted,

6 HEATHER E. WILLIAMS
7 Federal Public Defender

8 /s/ Megan T. Hopkins
9 MEGAN T. HOPKINS
10 Assistant Federal Defender
11 Attorney for Defendant
12 JOSE CURIEL

13 Dated: December 7, 2022

14 /s/ Clemente M. Jimenez
15 CLEMENTE M. JIMENEZ
16 Attorney for Defendant
17 ROBERTO TOSTADO-CADENAS

18 PHILLIP A. TALBERT
19 United States Attorney


20 Dated: December 7, 2022

21 /s/ Justin Lee
22 JUSTIN LEE
23 Assistant United States Attorney
24 Attorney for Plaintiff
25
26
27
28

ORDER

IT IS HEREBY ORDERED that the preliminary hearing scheduled for December 12, 2022, at 9:00 a.m. is continued to **March 6, 2023, at 9:00 a.m.** The time period between December 12, 2022 and March 6, 2023, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Dated: December 7, 2022



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE